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March 29, 2012



John C. Bottini
Senior Counsel - Environmental

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
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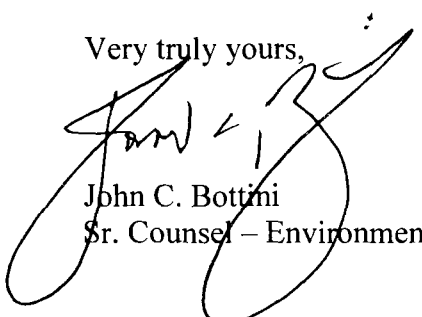
Ms. Deena Sheppard
Enforcement Specialist
U.S. Environmental Protection Agency – Region 5
Superfund Division (SC-5J)
77 West Jackson Blvd.
Chicago, Illinois
60604-3590

**Re: Request for Information Pursuant to Section 104(e) of CERCLA for the
Gary Development Landfill Site located at 479 Cline Avenue, in the City of
Gary, Indiana
(CERCLA ID No. IND077005916)**

Dear Ms. Sheppard:

Enclosed please find Georgia-Pacific LLC's collective response to the three requests for information pursuant to section 104(e) of CERCLA that Georgia-Pacific has received regarding the Gary Development Landfill Superfund Site (the "Site"). Please note that any further correspondence regarding this matter should be directed to me.

Very truly yours,



John C. Bottini
Sr. Counsel – Environmental

Enclosure

Response of Georgia-Pacific LLC to Request for Information Pursuant to Section 104(e) of CERCLA Regarding the Gary Development Landfill Site Located at 479 Cline Avenue, in the City of Gary, Lake County, Indiana (CERCLIS ID No. IND077005916)

INTRODUCTION

Pursuant to Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act, as amended (“CERCLA”), Georgia-Pacific LLC (“Georgia-Pacific”) respectfully submits the following response to the three requests for information (collectively, the “Request”) that Georgia-Pacific received regarding the Gary Development Landfill Site in Gary, Indiana (“Site”). Georgia-Pacific received three separate information requests related to this Site: one addressed to “Georgia Pacific, Assumed Name: Hopper Paper Company” (received on December 5, 2011); and two addressed to “H.P. Smith Paper Company, c/o Georgia Pacific” (one of which was received on November 28, 2011; the second was received on December 5, 2011).

In response to Georgia-Pacific’s request for clarification as to the scope of the Request, Ms. Nicole Wood-Chi, EPA Regional Counsel, advised Georgia-Pacific, via e-mail dated December 20, 2011, to “disregard the reference to Hopper Paper Company” and instead respond to the Request “with the understanding that EPA is interested in receiving information regarding Georgia-Pacific’s as well as the H.P. Smith Paper Company’s operations in Indiana, Illinois, Michigan, Wisconsin, and Ohio from 1970 through 1989.” Accordingly, Georgia-Pacific has interpreted all references to “H.P. Smith Paper Company” in the Questions below to include both H.P. Smith Paper Company and Georgia-Pacific and has limited its responses to the date range specified by Ms. Wood-Chi. In that same correspondence, Ms. Wood-Chi agreed to an extension of Georgia-Pacific’s response to March 5, 2012. Via telephone conference on February 24, 2012, Ms. Wood-Chi agreed to an additional extension of Georgia-Pacific’s response to March 29, 2012.

A. Limitations on Responses

a. Georgia-Pacific

Georgia-Pacific and its affiliated companies currently operate approximately 200 manufacturing facilities across North America, South America and Europe, ranging from large pulp, paper and tissue operations to gypsum plants, box plants and building products complexes. Per Ms. Wood-Chi’s instruction, Georgia-Pacific has limited the scope of its investigation to information concerning manufacturing operations that it currently owns and/or operates in Indiana, Illinois, Michigan, Wisconsin, and Ohio for the period of time 1970 through 1989.

Georgia-Pacific has surveyed the manufacturing operations that it currently owns and/or operates in Michigan, Ohio, Indiana, Illinois and Wisconsin for information regarding the Gary Development Landfill. These surveyed facilities were not aware of any information in their possession related to the Site. Through a review of historic files, Georgia-Pacific has located documents that indicate that non-hazardous waste was sent from Georgia-Pacific’s former paper mill in Gary, Indiana (the “Gary Mill”) to the Site. Accordingly, the Georgia-Pacific responses

provided below solely concern the Gary Mill. In the event Georgia-Pacific uncovers additional information that would suggest that one of the company's other current or former facilities has any connection to the Site, it reserves the right to amend the responses provided herein.

b. H.P. Smith Paper Company

Per Ms. Wood-Chi's instruction, Georgia-Pacific understands that the scope of this Request includes information in Georgia-Pacific's possession concerning the H.P. Smith Paper Company ("H.P. Smith"). Georgia-Pacific's relation to H.P. Smith can be summarized as follows. On or about October 12, 1983, James River Corporation of Virginia entered into a Stock Purchase Agreement with Phillips Petroleum Company and Phillips Petroleum Foundation to purchase all the issued and outstanding capital stock of H. P. Smith. On or about April 22, 1985, H.P. Smith merged into James River U.S. Holdings, Inc. On or about April 29, 1989, James River U.S. Holdings, Inc. merged into James River Paper Company, Inc. On or about April 30, 1991, James River U.S. Holdings, Inc. sold its Specialty Papers Division (which included the former H.P. Smith facilities) to Specialty Coatings Group. Through subsequent name changes and an acquisition, James River Paper Company, Inc. ultimately became Georgia-Pacific Consumer Products LP, which is currently a wholly-owned subsidiary of Georgia-Pacific LLC.

Given the corporate history described above, as well as the limited time period during which Georgia-Pacific's predecessor actually owned the H.P. Smith (1983-1991), Georgia-Pacific has been unable to locate much, if any, information (either in the form of documents or via past or present employees with knowledge) concerning H.P. Smith that is responsive to this Request. In the event Georgia-Pacific uncovers additional information regarding H.P. Smith that is responsive to this Request, it reserves the right to amend the responses provided herein.

c. Additional limitations and reservations of rights

To respond to the Request in a timely manner, Georgia-Pacific has based this response on information available to it at this time. Georgia-Pacific's information concerning the time period at issue in this Request is limited as a result of routine document retention practices as well as the fact that many employees who may have had pertinent knowledge no longer work for the company, or in some cases, may have passed away. Although Georgia-Pacific believes that this response is complete, it reserves the right to amend or supplement this or any other response should it become aware of additional documents or information that it considers material to the Site.

In the course of performing its review, Georgia-Pacific may have found communications between it and counsel that are arguably responsive to the Request, but that fall within the attorney-client or work product privilege. Please be aware that Georgia-Pacific is not providing documents subject to the attorney-client or work product privileges, and the company does not, by providing this response, waive any attorney-client or work product privileges.

By this response, Georgia-Pacific does not waive any rights, defenses, claims or remedies, and makes no admission of any fact, law or liability. Additionally, Georgia-Pacific does not represent that it subscribes to or agrees with any EPA assumption in the matter of the Gary Development Landfill Site.

B. Individuals Consulted

The individual who prepared the response on behalf of Georgia-Pacific LLC is:

John C. Bottini
Senior Counsel – Environmental
Georgia-Pacific LLC
133 Peachtree St., NE
Atlanta, Georgia 30303
(404) 652-4883

Exhibit A contains a list of those current and former employees who were consulted in preparation of this response. Georgia-Pacific requests that the individuals listed in Exhibit A only be contacted through John C. Bottini, Senior Counsel – Environmental, Georgia-Pacific LLC, 133 Peachtree St., NE, Atlanta, GA 30303, (404) 652-4883.

C. Confidential Business Information

Georgia-Pacific is claiming confidential business information ("CBI") status for certain information that has been identified as on the attached CD marked "Confidential Business Information" (the "CBI CD"). The other CD that is not so labeled contains non-confidential materials. The information on the CBI CD is presented in compliance with 40 C.F.R. §§ 2.203(b) and 2.301 pertaining to trade secrets and CBI. The information on the CBI CD is eligible for CBI treatment under 40 C.F.R. § 2.208 for the following reasons: (a) this claim of confidentiality does not have any term or expiration and continues indefinitely; (b) Georgia-Pacific does not release information claimed as CBI to non-employees, except subject to confidentiality agreements; only limited authorized employees have access to the financial information and production information claimed as CBI; Georgia-Pacific intends to continue to keep internal distribution of this material limited and to prohibit external distribution; (c) the information is not, and has not been, obtainable without Georgia-Pacific's consent by use of legitimate means; (d) there is no statutory obligation to disclose this information; and (e) disclosure of this information would harm Georgia-Pacific's competitive position by making risk management information potentially known to Georgia-Pacific's competitors.

D. Attachments

As stated above, enclosed with this letter are two compact discs ("CD") that contain the referenced files in Adobe Acrobat (pdf) format unless otherwise noted. One CD contains those responses and documents that Georgia-Pacific considers CBI. The other CD contains all other responses and documents. These documents and the responses in this letter have been organized to be consistent with the format of the questions in the Request. Where one document is relevant to more than one question, a single copy of that document has been provided.

RESPONSES TO SPECIFIC QUESTIONS

- 1. Provide copies of all documents, records, and correspondence in your possession relating to Gary Development Landfill.**

Exhibit 1 contains copies of all documents, records, and correspondence in Georgia-Pacific's possession that concern the Gary Mill and/or H.P. Smith's relationship to the Site.

- 2. Identify and describe, and provide all documents that refer or relate to:**
 - a. The precise location, address, and name of the facility where disposal, treatment, unloading, management, and handling of the hazardous substances occurred. Provide the official name of the facility and a description of the facility where each hazardous substance involved in such transactions was actually disposed or treated.**

Georgia-Pacific is unsure as to the intended scope of Question 2 and its subparts, but assumes for purposes of this response that EPA is seeking information regarding any Georgia-Pacific or H.P. Smith facility that sent hazardous substances to the Site. Georgia-Pacific is aware of two facilities that may have sent material to the Site: (1) an H.P. Smith facility referenced in an October 14, 1996 memorandum prepared by the Indiana Department of Environmental Management (the "1996 IDEM Memo", a copy of which is attached in Exhibit 2(a)); and (2) Georgia-Pacific's former Gary Mill. Each of these facilities is discussed below.

H.P. Smith Paper Company

As described above, a predecessor of Georgia-Pacific, James River Company of Virginia, purchased the stock of H.P. Smith from Phillips Petroleum Company and Phillips Petroleum Foundation, Inc. on October 17, 1983. According to the 1983 stock purchase agreement, H.P. Smith owned two facilities at that time: (a) a facility located at 5001 West 66th Street, Village of Bedford Park (Chicago), Illinois 60638; and (b) a facility located at 2000 Industrial Park Road, Iowa City, Iowa 52240. A copy of the 1983 stock purchase agreement which references these two facilities is attached in Exhibit 2(a).

Georgia-Pacific has been unable to locate any information that would allow it to determine which H.P. Smith facility is identified in the 1996 IDEM Memo. According to the 1996 IDEM Memo, H.P. Smith is listed in a March 11, 1977 letter as one of sixteen (16) generators that allegedly sent waste to the Site. The 1996 IDEM Memo does not identify an address for H.P. Smith. Furthermore, the Memo notes that H.P. Smith's disposal site was listed as "Midwest Solvent Recycling Corporation (MIDCO)." Thus, it is unclear from the 1996 IDEM Memo whether H.P. Smith sent any waste to the Site. It is likewise unclear whether the "drum waste" attributed to H.P. Smith was a "hazardous substance," as that term is defined in the Request.¹

¹ Aside from the 1996 IDEM Memo, the only documents concerning H.P. Smith's waste disposal practices generally that Georgia-Pacific has been able to locate were obtained from EPA as a result of a FOIA request dated November 24, 2003 regarding the Lake Calumet Cluster Superfund Site. Those documents have been previously

Georgia-Pacific's Former Gary Mill

From 1964 until 2002, Georgia-Pacific owned and operated an industrial tissue manufacturing facility at Second Place and Waite Street, Gary, Indiana 46401. A review of available information regarding waste disposal practices at the Gary Mill for the time period 1970 through 1989 suggests that process residuals (in the form of clarifier sludge) and miscellaneous office and mill trash — neither of which met the definition of “hazardous substance” — were, at various times, transported from the Gary Mill to the Site.

All liquid process wastes produced at the Gary Mill were pretreated in a primary clarifier prior to discharging the effluent into the Gary Sanitary Sewer District. Suspended solids, consisting primarily of cellulose fiber and clay fragments, were removed from the clarifier in the form of sludge (hereinafter the “process residuals”). Based on a series of test results completed during the period 1970 through 1989 and attached in Exhibit 2(a), the process residuals were repeatedly determined not to be hazardous waste and the State of Indiana authorized the disposal of the residuals at municipal landfills as well as the Site.

Beginning in or around 1969 and continuing until 1983, the Gary Mill piped its process residuals to two, 6.1-acre lagoons for dewatering and storage. The lagoons were located approximately 0.25 miles northwest of the Gary Mill on property owned by Georgia-Pacific. In or around 1983, the Gary Mill added a screw press to dewater sludge from the clarifier such that storage in the lagoons was no longer necessary except as needed to facilitate closure of the lagoons.

In 1976 and 1977, the holding lagoons were cleaned (one lagoon was completely cleaned; the other partially cleaned), and the process residuals were hauled to the Site by Industrial Disposal Corporation of East Chicago, Indiana.² According to a state inspector, it was estimated that 300,000 cubic yards of process residuals were transported from the Gary Mill lagoons to the Site, although Georgia-Pacific has not been able to confirm that estimate. Georgia-Pacific is not aware of any other shipments of process residuals from the Gary Mill to the Site from 1970 through 1989. Beginning in or around 1970 and continuing at least through 1982, the Gary Mill also contracted with Industrial Disposal Corporation of East Chicago, Indiana to dispose of miscellaneous office waste and mill trash at the Site. Available documentation referencing these transactions is attached in Exhibit 1.

- b. If the location or facility of such disposal, treatment, unloading, management and handling is a different location or facility than what was originally intended, please provide all documents that relate and/or refer to why the substances came to be located at the different location or facility.**

submitted to EPA Region 5, but for the sake of completeness, a set of those documents is also included with this response in Exhibit 2(a). To be clear, none of these documents concerns the Gary Development Landfill Site, and thus Georgia-Pacific does not believe these are relevant to this Request.

² At or near the time of this transaction, Industrial Disposal Corporation's contact information was listed as follows: Industrial Disposal Corporation, 4208 Elm Street, East Chicago, Indiana (mailing address); 1102 E. Columbus Drive, East Chicago, Indiana (garage and office); Dan McArdle, Operation Superintendent (219-397-2664).

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- c. The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each arrangement.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- d. All intermediate sites where the hazardous substances involved in each arrangement were transshipped, or where they were stored or held, any time prior to final treatment or disposal.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- e. In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement.**

Georgia-Pacific's response to Question 2(a) above summarizes the information and documents it has located concerning any non-hazardous substances that were sent from the Gary Mill to the Site from 1970 through 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- f. The condition of the transferred material containing hazardous substances when it was stored, disposed, treated or transported for disposal or treatment.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- g. The markings on and type, condition and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- h. All tests, analyses, analytical results and manifests concerning each hazardous substance involved in each transaction. Please include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.)**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- i. The final disposition of each of the hazardous substances involved in each arrangement.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- j. All persons, including you, who may have entered into an agreement or contract for the disposal, treatment or transportation of a hazardous substance at or to the Site. Please provide the persons' titles and departments/offices.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- i. The names, addresses, and telephone numbers of persons or entities who received the hazardous substances from the persons described in 2(j) above.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- ii. Any person with whom the persons described in 2(j) made such arrangements.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

iii. The dates when each person described in 2(j) made such arrangements and provide any documentation.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

iv. The steps you or other persons, including persons identified in 2(j) above took to reduce the spillage or leakage. Please identify any operational manuals or policies (e.g. a facility's spill control policy) which address the management of spills and leaks and provide any documentation.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

v. The amount paid by you, or other persons referred to in 2(j) above in connection with each transaction for such arrangement, the method of payment, and the identity of the persons involved. Please provide any contacts, written agreements, or documentation reflecting the terms of the agreements.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

vi. The amount of money received by you or other persons referred to in 2(j) above for the sale, transfer, or delivery of any material containing hazardous substances and provide any documentation. If the material was repaired, refurbished, or reconditioned, how much money was paid for this service?

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- k. Who controlled and/or transported the hazardous substances prior to delivery to the Site? Provide agreements and/or documents showing the times when each party possessed the hazardous substances.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- l. The owner(s) or possessor(s) (persons in possession) of the hazardous substances involved in each arrangement for disposal or treatment of the substances. If the ownership(s) changed, when did this change(s) occur? Please provide documents describing this transfer of ownership, including the date of transfer, persons involved in the transfer, reason for the transfer of ownership, and details of the arrangement(s) such as contracts, agreements, etc. If you did not own the hazardous substances when shipped, who did own it and how did you come to own the hazardous substances?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- m. Who selected the location where the hazardous substances were to be disposed or treated?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- n. How were the hazardous substances or materials containing hazardous substances planned to be used at the Site?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- o. What was done to the hazardous substances once they were brought to the Site, including any service, repair, recycling, treatment, or disposal.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from its Gary Mill to the Site during the period 1970 to

1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

p. What activities were typically conducted at the Site or the specific facility where the hazardous substances were sent? What were the common business practices at the Site? How and when did you obtain this information?

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

q. How were the hazardous substances typically used, handled, or disposed of at the Site?

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

r. How long did you have a relationship with the owner(s) and/or operator(s) of the Site?

Georgia-Pacific has not identified any information responsive to this Question other than that which is provided in response to Question 2(a) above.

s. Did you have any influence over waste disposal activities at the Site? If so, how?

Georgia-Pacific has not identified any information responsive to this Question other than that which is provided in response to Question 2(a) above.

t. What percentage of your total hazardous substances went to the Site?

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

u. What steps did you take to dispose of or treat the hazardous substances? Please provide documents, agreements and/or contracts reflecting these steps.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to

1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

v. What involvement (if any) did you have in selecting the particular means and method of disposal of the hazardous substances.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

w. At the time you transferred the hazardous substances, what did you intend to happen to the hazardous substances? Please provide any contracts, written agreements, and/or other documentation reflecting the intention of the parties. If you do not have such documents and/or materials, please so state.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

x. With respect to all transactions involving hazardous substances, at the time of the transaction, specify the measures you took to determine the actual means of treatment, disposal or other uses of hazardous substances. Provide information you had about the treatment and disposal practices at the Site. What assurances, if any, were you given by the owners/operators at the Site regarding the proper handling and ultimate disposition of the materials you sent there?

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

y. What efforts, if any, did you take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering (e.g., for repair, consignment, or joint-venture), disposing of, or arranging for the treatment or disposal of any hazardous substances.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- z. Was there a shrinkage/spillage provision or loss allowance in the contract, or an understanding outside of the contract? As a part of the transaction, was there any penalty for shrinkage, spillage, or loss? Did the arrangement acknowledge that spills would occur?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- 3. Provide names, addresses and telephone numbers of any individuals including former and current employees, who may be knowledgeable of H.P. Smith's operations and hazardous substances handling, storage and disposal practices.**

Those current Georgia-Pacific employees who may have knowledge regarding the Gary Mill's operations and hazardous substance handling, storage and disposal practices include Garry Griffith and Scott Rois, both of whom are listed in Exhibit A. Georgia-Pacific requests that the individuals listed in Exhibit A only be contacted through John C. Bottini, Senior Counsel – Environmental, Georgia-Pacific LLC, 133 Peachtree St., NE, Atlanta, GA 30303, (404) 652-4883.

Georgia-Pacific has been unable to identify any past or present employees who have knowledge regarding H.P. Smith's operations, and therefore Georgia-Pacific has no information responsive to this request as it pertains to H.P. Smith.

- 4. State the date(s) on which the drums and/or hazardous substances were sent, brought or moved to the Site and the names, addresses and telephone numbers of the person(s) making arrangements for the drums to be sent, brought or moved to the Site.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- 5. List all federal, state and local permits and/or registrations issued to H.P. Smith for the transport and/or disposal of materials.**

Georgia-Pacific has identified the following approvals (attached in Exhibit 5) issued by the State of Indiana for the time period 1970 through 1989 for the disposal of process residuals and miscellaneous trash from the Gary Mill:

- a. April 16, 1975 memo and accompanying letter from State of Indiana approving the disposal of process residuals from the Gary Mill's lagoons at various construction landfills.

- b. January 31, 1977 letter from the Indiana Stream Pollution Control Board approving the process residuals and miscellaneous trash disposal practices at the Gary Mill, including the delivery of the residuals and miscellaneous trash to the Site (attached in Exhibit 1).
- c. Correspondence from the Indiana Environmental Management Board to Indiana Waste Systems, Inc. dated August 11 and September 14, 1982 approving the disposal of process residuals from the Gary Mill at the Wheeler Landfill, OPP. No. 64-3, Porter County, Indiana.
- d. August 18, 1983 letter from the Indiana Environmental Management Board to Clark Materials Handling, Inc. approving the disposal of process residuals from the Gary Mill at the Gary Airport exclusion site.

Based on the H.P. Smith waste handling documentation referenced in footnote 1 above, a special waste disposal application was submitted in 1981 to the Illinois Environmental Protection Agency by Alburn, Inc. for the disposal of waste solvents from H.P. Smith's Chicago, Illinois facility. H.P. Smith was later assigned Generator Number 0316000246. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

6. Which shipments or arrangements were sent under each permit? If what happened to the hazardous substances differed from what was specified in the permit, please state, to the best of your knowledge, the basis or reasons for such difference.

Georgia-Pacific has not been able to identify any information, beyond that which is listed in the response to Question 5, that indicates which, if any, shipments or arrangements were sent to the Site between 1970 and 1989 under any waste disposal permit issued to the Gary Mill.

The waste manifests attached in Exhibit 2(a) identify waste shipments that were made from H.P. Smith's Chicago, Illinois facility to Alburn, Inc.'s facility at 119th Street, Chicago, Illinois. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

7. Were all hazardous substances transported by licensed carriers to hazardous waste TSDFs permitted by the U.S. EPA?

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989.

The waste manifests attached in Exhibit 2(a) indicate that shipments of hazardous substances from H.P. Smith's Chicago, Illinois facility to Alburn, Inc.'s facility at 119th Street,

Chicago, Illinois were conducted by D & J Waste Refuse, who was licensed to transport such wastes pursuant to EPA Identification No. ILT 180011397 and state Solid Waste Hauler Registration No. 0868.

8. List all federal, state and local permits and/or registrations and their respective permit numbers issued for the transport and/or disposal of wastes.

Based on information available to Georgia-Pacific, the company responsible for hauling non-hazardous waste from the Gary Mill to the Site, Industrial Disposal Company, transported this waste pursuant to Permit No. IN-4507-1000-11. Information in Georgia-Pacific's possession related to the approvals obtained by other third parties for the transport and/or disposal of waste from the Gary Mill during the period of 1970 through 1989 is provided in response to Question 5 above.

The waste manifests attached in Exhibit 2(a) indicate that shipments of hazardous substances from H.P. Smith's Chicago, Illinois facility to Alburn, Inc.'s facility at 119th Street, Chicago, Illinois were conducted by D & J Waste Refuse, who was licensed to transport such wastes pursuant to EPA Identification No. ILT 180011397 and state Solid Waste Hauler Registration No. 0868. The disposal site of the wastes, Alburn, Inc., was assigned EPA Identification No. ILD000716852. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

9. Does your company or business have a permit or permits issued under RCRA? Does it have, or has it ever had, a permit or permits under the hazardous substance laws of the State of Indiana? Does your company or business have an EPA Identification Number, or an identification number supplied by the State Environmental Protection Agency? Supply any such identification number(s) your company or business has.

The Gary Mill submitted a protective Part A Hazardous Waste Permit Application to EPA on or about November 19, 1980. On August 6, 1984, EPA Region 5 accepted Georgia-Pacific's request to withdraw this same application. In this same letter, Region 5 concluded that the Gary Mill was not required to have a hazardous waste permit under Section 3005 of RCRA. A copy of the referenced correspondence between the Gary Mill and EPA Region 5 is attached in Exhibit 9. The EPA identification number assigned to the Gary Mill at that time was IND003938800. Georgia-Pacific is not aware of any other permits issued to the Gary Mill during the time period 1970 through 1989 that concern state or federal hazardous substance laws.

Georgia-Pacific has not been able to identify any information regarding the RCRA permitting status, if any, of any H.P. Smith facility for the time period 1970 through 1989. Based on the H.P. Smith waste handling documentation referenced in footnote 1 above, a special waste disposal application was submitted to the Illinois Environmental Protection Agency by Alburn, Inc. for the disposal of waste solvents from H.P. Smith's Chicago, Illinois facility. H.P. Smith was later assigned a Generator Number 0316000246. The current EPA identification

numbers listed by EPA for the two former H.P. Smith properties identified in the response to Question 2(a) are (1) ILD005120423 (for 5001 West 66th Street, Chicago, Illinois); and (2) IAD050691617 (for 2000 Industrial Park Road, Iowa City, Iowa).

10. Identify whether a Notification of Hazardous Waste Activity was ever filed with the EPA or the corresponding agency or official of the State of Indiana, the date of such filing, the wastes described in such notice, the quantity thereof described in such notice, and the identification number assigned to such facility by EPA or the state agency or official.

The Gary Mill submitted a Notification of Hazardous Waste Activity to EPA Region 5, and received an acknowledgement from Region 5 on October 2, 1981. The following waste codes were listed in the Notification: F001 (spent halogenated solvents used in degreasing), F002 (spent halogenated solvents), F003 (spent non-halogenated solvents), F004 (spent non-halogenated solvents), U002 (acetone), U122 (formaldehyde), U154 (methyl alcohol), and U220 (toluene). Georgia-Pacific has not been able to identify the quantity of the wastes referenced in the Notification materials. The EPA identification number assigned to the Gary Mill was IND003938800.

See response to Question 9 for responsive information in Georgia-Pacific's possession concerning H.P. Smith.

11. Provide the correct name and addresses of your plants and other buildings or structures where H.P. Smith carried out operations in Indiana and Illinois (excluding locations where ONLY clerical/office work was performed).

See response to Question 2(a) above for the correct names and addresses of facilities owned by H.P. Smith and Georgia-Pacific at any time from 1970 through 1989 in Illinois and Indiana that may have had a connection to the Site.

12. Provide a schematic diagram or flow chart that fully describes and/or illustrates your company's operations.

Please see the document attached in Exhibit 12 for information responsive to this Question as it pertains to the Gary Mill. Georgia-Pacific has not identified any information in its possession that is responsive to this Question as it pertains to H.P. Smith.

13. Provide a brief description of the nature of your company's operations at each location including: If the nature or size of your company's operations changed over time, describe those changes and the dates they occurred.

The history of the Gary Mill, to the best of Georgia-Pacific's knowledge, is described as follows. The facility was built in or around 1948 by Gary Post Tribune and was known as the Gary Paper Mill. In 1953, the mill (under the same ownership) began making wallpaper and became known as the Beverly Mill. In 1955, the Beverly Mill was purchased by Steiner Corporation of America and began producing toweling paper. Georgia-Pacific acquired the mill

in 1964 and manufactured industrial tissue at the facility until 2002, at which time the mill was sold to SCA. At some point prior to 1973, it is believed that the Gary Mill added a converting room, shipping warehouse, wastewater treatment primary clarifier, a felt section and a 12-foot Yankee dryer. Beginning in or around 1968 and continuing until 1983, the facility piped process residuals to two approximately 6.1 acre storage lagoons located approximately 0.25 mile northwest of the Gary Mill. In or around 1983, the Gary Mill added a screw press to dewater sludge from the clarifier such that storage in the lagoons was no longer necessary except as needed to facilitate closure of the lagoons. See Exhibit 13 for additional information relevant to historical operations at the Gary Mill.

Georgia-Pacific has been unable to identify relevant documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any information responsive to this Question as it pertains to H.P. Smith.

14. List the types of raw materials used in your company's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Georgia-Pacific's operations at the Gary Mill can be described as follows. Waste paper was purchased from waste paper dealers. This waste paper was placed into large (6' to 12' diameter) tanks (also known as pulpers or beaters) with an agitator in the bottom similar to a Waring blender. Water was then added and this paper was beaten to a slush form. This slush stock was cleaned of debris prior to being pumped to a fourdrinier paper machine that made a continuous web of paper toweling.

The Gary Mill used various process additives in its re-pulping and paper-making operations at the Gary Mill from 1970 through 1989. Given the length of time Georgia-Pacific operated the Gary Mill, Georgia-Pacific cannot identify how long (or how much) the following additives may have been used in its processes.

The following chemicals were added to the pulpers in the waste paper process: caustic soda, SOLVOX 261 and sulfuric acid. The following chemicals were added to the water or slush stock on the paper machine: (1) sulfuric acid (to control pH); (2) aluminum sulfate (for retention and to set the rosin size); (3) urea formaldehyde (to give the toweling strength when it is wet); (4) rosin size (to allow the roll towel to dispense from a cabinet); (5) SOLVOX 906 (to make the toweling more absorbent); (6) SOLVOX 1230 (a defoamer); and (7) SOLVOX 615 (to control the release on the Yankee dryer).

Additional process additives may have been used at various times from 1970 through 1989 at the Gary Mill including: (1) deinking aides (Solvox 254 and Texo 586); (2) caustic (sodium hydroxide, in both liquid and flake form); (3) Drewfax R-122 (a release agent for the Yankee dryer); (4) slimicide (Buckman Busan #40); (5) Bubond 65; (6) dyes (Phenamine Fast Scarlet & Stilbene Yellow TP); (7) bleaching agents (Solvox Special K.B., Solvox Special F.B., HTH – Calcium Hypochlorite); (8) hydrochloric acid; (9) muriatic acid; (10) soluble oil; (11) Calgon; (12) Igepal RC 520; (13) soda ash (calcium carbonate); (14) vaporized tall oil; (15) Novaflo 50; (16) Nalco 7620WB & 623NC; (17) Amres 2552; (18) Solvox 870, 718, 165, 174

and 261; (19) salt; (20) Amerpac 8703; and (21) Advantage 101. See Exhibit 14 for additional information.

Georgia-Pacific has been unable to identify any relevant documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any information responsive to this Question as it pertains to H.P. Smith.

15. Provide copies of Material Safety Data Sheets (MSDS) for materials used in your company's operations.

Georgia-Pacific has been able to locate copies of MSDS's for some, but not all, of the raw materials listed in response to Question 14 from the time period 1970 through 1989. Copies of those MSDS's in Georgia-Pacific's possession are attached in Exhibit 15. Georgia-Pacific has been unable to identify any responsive documents regarding the materials that may have been utilized in the operations of H.P. Smith.

16. Provide any release reports that were taken pursuant to Section 103(a) of CERCLA and Section 304 of the Emergency Planning and Community Right-to-Know Act (EPCRA).

Georgia-Pacific has not been able to identify any information regarding release reports that may have been submitted pursuant to Section 103(a) of CERCLA or Section 304 of EPCRA for either the Gary Mill or any H.P. Smith facility for the period of time 1970 through 1989, and therefore has no information responsive to this Question.

17. Identify all federal offices to which H.P. Smith has sent or filed hazardous substance or hazardous waste information.

Georgia-Pacific has located correspondence between the Gary Mill and EPA Region 5 beginning in 1980 concerning hazardous substance or hazardous waste information. See responses to Questions 9 and 10 for more information. Georgia-Pacific has identified a 2005 response to an EPA Region 5 Information Request that it filed on behalf of H.P. Smith regarding the Lake Calumet Cluster Superfund Site.

18. State the years during which such information was sent/filed.

See response to Question 17.

19. Identify (see Definitions) all Illinois and Indiana state offices to which H.P. Smith has sent or filed hazardous substance or hazardous waste information.

Georgia-Pacific has identified correspondence for the time period 1970 through 1989 between the Gary Mill and various Indiana state offices concerning waste disposal issues, including the Indiana Department of Environmental Management (1989); the Indiana State Board of Health, Water Pollution Control Division (1976); Indiana Stream Pollution Control Board (1977); Indiana State Board of Health, Division of Land Pollution Control (1982).

As set forth in footnote 1 above, Georgia-Pacific has identified waste manifests completed by H.P. Smith's Chicago, Illinois facility that reference the Illinois Environmental Protection Agency, Division of Land Pollution Control. These waste manifests are dated 1981 and 1982.

20. State the years during which such information was sent/filed.

See response to Question 19.

21. List all federal and state environmental laws and regulations under which H.P. Smith has reported to federal or state governments, including but not limited to: Toxic Substances Control Act (TSCA), 15 U.S.C. Sections 2601 to 2692; Emergency Planning and Community Right-to-Know Act (EPCRA), 42 U.S.C. Sections 11001 to 11050; and the Clean Water Act 33 U.S.C. Section 1251 to 1387.

During the time period 1970 through 1989, the Gary Mill reported to various federal, state and local governmental authorities pursuant to laws and regulations covering water, waste and air issues. Specific environmental laws and regulations referenced in the available correspondence include: State of Indiana Regulations SPC-15 and SPC-18, Gary Sanitary Sewer District Sewer Use and Pretreatment Ordinance No. 6101, the Gary Air Quality Control Ordinance, EPCRA (Form R and Tier II reports), RCRA, CERCLA and the Clean Water Act.

Based on the H.P. Smith waste handling documentation referenced in footnote 1 above, a special waste disposal application was submitted to the Illinois Environmental Protection Agency in 1981 by Alburn, Inc. for the disposal of waste solvents from H.P. Smith's Chicago, Illinois facility. Georgia-Pacific is not aware of any additional information that is responsive to this Question as it pertains to H.P. Smith.

22. Identify the federal and state offices to which such information was sent.

Georgia-Pacific has identified the following agencies as recipients of the Gary Mill correspondence referenced in response to Question 21: EPA Region 5, the Indiana Department of Environmental Management (and its predecessor agencies), the Gary Sanitary District, and the City of Gary, Air Pollution Control – Division of Department of Health.

See response to Question 21 for responsive information that pertains to H.P. Smith.

23. For each type of waste (including by-products) from H.P. Smith's operations in Indiana and Illinois during the time period of 1975 through 1999, including but not limited to all liquids, sludges, and solids, provide the following information:

a. its physical state;

The primary solid waste generated at the Gary Mill from 1970 through 1989 was papermaking process residuals from its primary clarifier, which has been described above in the response to Question 2(a). An analysis of these process residuals in 1975 stated that the

residuals consisted of 85% water, 14% solids, and 1% bio-degradable materials. From approximately 1969 to 1983, the sludge was stored in two on-site dewatering lagoons. In 1983, the addition of a screw press at the Gary Mill enabled the facility to dewater the residuals, thus increasing the solids content of the residuals and allowing them to be disposed without further pretreatment. Other solid wastes that may have been generated at the Gary Mill from 1970 through 1989 include used oil, empty metal drums, and general plant trash and refuse. Georgia-Pacific has not identified any information that would allow it to respond with specificity as to the physical state of these other waste streams.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as “Solvent N.O.S.” — generated at H.P. Smith’s Chicago, Illinois facility in 1981 and 1982. This waste was described on waste manifests as a flammable liquid. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

b. its nature and chemical composition;

As set forth in more detail in the response to Question 2(a) above and the accompanying test data attached in Exhibit 2(a), the process residuals generated by the Gary Mill from 1970 through 1989 were determined not to be a hazardous substance. The test data attached in Exhibit 2(a) lists the specific levels of certain constituents in the process residuals. Georgia-Pacific has not identified any information that would allow it to respond with specificity as to the nature and chemical composition of the other waste streams that may have been generated at the Gary Mill during the time period 1970 through 1989.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as “Solvent N.O.S.” — generated at H.P. Smith’s Chicago, Illinois facility in 1981 and 1982. The documents attached in Exhibit 2(a) provide analytical test results that describe the chemical composition of the material. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

c. its color;

The process residuals generated by the Gary Mill from 1970 through 1989 were gray, although they were also described by a state inspector in a August 19, 1976 memorandum as “moist blue clay.” Georgia-Pacific has not identified any information that would allow it to respond with specificity as to the color associated with other waste streams generated at the Gary Mill during the time period 1970 through 1989.

Georgia-Pacific has been unable to locate any information responsive to this Question as it pertains to H.P. Smith.

d. its odor;

The process residuals generated at the Gary Mill from 1970 through 1989 had the smell of wet paper. Georgia-Pacific has not identified any information that would allow it to respond with specificity as to any odor associated with other waste streams generated at the Gary Mill during the time period 1970 through 1989.

Georgia-Pacific has been unable to locate any information responsive to this Question as it pertains to H.P. Smith.

e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and

To the best of Georgia-Pacific's knowledge, approximately 5-10 tons of process residuals were generated per day at the Gary Mill. That number, however, was likely to have fluctuated throughout the relevant time period (1970 through 1989) based on production levels. Georgia-Pacific has not been able to identify any information regarding the approximate monthly and annual volumes of other types of waste generating at the Gary Mill from 1970 through 1989.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as "Solvent N.O.S." — generated at H.P. Smith's Chicago, Illinois facility in 1981 and 1982. According to a 1981 special waste disposal application (included within Exhibit 2(a)), the estimated annual waste volume of waste solvents was 100,000 gallons. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

f. the dates (beginning & ending) during which each type of waste was produced by Your company's operations.

The Gary Mill produced process residuals throughout the time period 1970 through 1989. Georgia-Pacific has not identified any information that would allow it to respond with specificity as to when the other waste streams at the Gary Mill were first generated and when, or if, the generation of such waste streams ceased at any time from 1970 through 1989.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as "Solvent N.O.S." — generated at H.P. Smith's Chicago, Illinois facility in 1981 and 1982. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

24. Provide a schematic diagram that indicates which part of H.P. Smith's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Georgia-Pacific has been unable to locate a document or an individual with knowledge that can provide an accurate diagram that is responsive to Question 24 as it pertains to either the Gary Mill or H.P. Smith.

25. Describe how each type of waste was collected and stored at H.P. Smith's operation prior to disposal/recycling/sale/transport, including:

a. the type of container in which each type of waste was placed/stored; and

From 1970 until in or around 1983, the process residuals generated at the Gary Mill were piped to the two on-site lagoons for storage and dewatering. Beginning in or around 1983, the installation of a screw press at the Gary Mill allowed the dewatered sludge to be transported directly from the Mill to the Gary Airport exclusion site. Georgia-Pacific has not been able to identify any information regarding the specific types of containers in which other types of waste was placed/stored at the Gary Mill from 1970 through 1989.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as “Solvent N.O.S.” — generated at H.P. Smith’s Chicago, Illinois facility in 1981 and 1982. According to the manifests, this waste stream was transported in drums. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

b. where each type of waste was collected/stored.

From 1970 until in or around 1983, the Gary Mill’s process residuals were piped to the two on-site lagoons for storage and dewatering. Beginning in or around 1983, the installation of a screw press at the Gary Mill allowed the dewatered sludge to be transported directly from the Mill to the Gary Airport exclusion site. Georgia-Pacific has not been able to identify any information regarding the specific location where other types of waste were collected or stored at the Gary Mill from 1970 through 1989.

Georgia-Pacific has been unable to locate any information responsive to this Question as it pertains to H.P. Smith.

26. Provide copies of all casualty, liability and/or pollution insurance policies, and any other insurance contracts related to the Gary Development Landfill (including, but not limited to, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies, Institutional Controls and Post Remediation Care Insurance) that provide H.P. Smith with liability insurance for damage to third party property from 1975 through 1999.

Please see Exhibit 26 on CBI CD for Georgia-Pacific’s response to this Question.

27. To the extent not provided in Question 26 above, provide copies of all insurance policies that may potentially provide H.P. Smith with insurance for bodily injury,

property damage and/or environmental contamination in connection with the Site and/or H.P. Smith's business operations. Include, without limitation, all comprehensive general liability, primary, excess, and umbrella policies.

Please see response to Question 26.

- 28. To the extent not identified in Questions 26 or 27 above, provide all other evidence of casualty, liability and/or pollution insurance issued to your company for the period being investigated as identified in Question 26.**

Please see response to Question 26.

- 29. If there are any such policies from Questions 26, 27, or 28 above of which you are aware but neither possess copies, nor are able to obtain copies, identify each such policy to the best of your ability by identifying:**

a. The name and address of each insurer and of the insured;

Please see response to Question 26.

b. The type of policy and policy numbers;

Please see response to Question 26.

c. The per occurrence policy limits of each policy; and

Please see response to Question 26.

d. The effective dates for each policy.

Please see response to Question 26.

- 30. Identify all insurance brokers or agents who placed insurance for the H.P. Smith at any time during the period being investigated as identified in Question 26, and identify the time period during which such broker or agent acted in this regard. Identify by name and title, if known, individuals at the agency or brokerage most familiar with H.P. Smith's pollution and/or liability insurance program and the current whereabouts of each individual.**

To the best of Georgia-Pacific's knowledge, the primary insurance broker for the James River Corporation policies listed in response to Question 26 was Alexander & Alexander of Richmond, Virginia. The primary insurance broker for the Georgia-Pacific Corporation policies listed in response to Question 26 was Marsh & McLennan of Portland, Oregon.

- 31. Identify all previous settlements by your company (or your company's predecessors) with any insurer which relates in any way to environmental liabilities and/or to the policies referenced in Questions 26-29 above, including:**

a. The date of the settlement;

Please see Exhibit 31 on CBI CD for Georgia-Pacific's response to the Question.

b. The scope of release provided under such settlement;

See response to Question 31(a).

**c. The amount of money paid by the insurer pursuant to such settlement.
Provide copies of all such settlement agreements.**

See response to Question 31(a).

32. Identify all communications and provide all documents that evidence, refer, or relate to claims made by or on behalf of the H.P. Smith under any insurance policy referenced in Questions 26-29 above. Include any responses from the insurer with respect to any claims.

Georgia-Pacific respectfully objects to this Question as overly broad and unduly burdensome, especially considering the number of years and insurance policies at issue. Should any of the policies referenced in response to Question 26 become material to EPA's investigation, Georgia-Pacific will supplement its responses to address specific policies and relevant communications and claims related to those particular policies upon request.

33. Identify any and all insurance, accounts paid or accounting files that identify H.P. Smith's insurance policies.

Georgia-Pacific respectfully objects to this Question as overly broad and unduly burdensome, especially considering the number of years and insurance policies at issue. Should any of the policies referenced in response to Question 26 become material to EPA's investigation, Georgia-Pacific will supplement its responses to address specific policies and files that Georgia-Pacific may have in its possession that are related to those particular policies upon request.

34. List all named insureds on property, pollution and/or casualty liability insurance providing coverage to H.P. Smith during the period being investigated as identified in Question 26, and the date such named insureds appeared on the policies.

In general, the named insureds on the insurance policies referenced in response to Question 26 above are, in the case of Georgia-Pacific, Georgia-Pacific Corporation at its subsidiaries. In the case of James River, the named insureds on the referenced policies are listed as James River Corporation and its subsidiaries.

35. Identify any person or organization requiring evidence of H.P. Smith's casualty, liability and/or pollution insurance during the period being investigated as identified in Question 26, including the nature of the insurance requirement and the years when the evidence was required.

Georgia-Pacific respectfully objects to this Question as overly broad and unduly burdensome, especially considering the number of years and insurance policies at issue. Should any of the policies referenced in response to Question 26 become material to EPA's investigation, Georgia-Pacific is willing to supplement its responses to address specific policies and relevant communications and claims related to those particular policies upon request.

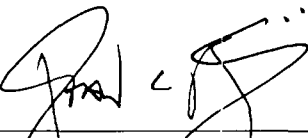
36. Identify your company's policy with respect to document retention.

Georgia-Pacific's official records retention policy contains information that the company views as privileged and confidential. In the event EPA can identify specific aspects of Georgia-Pacific's policy that the agency views as material to its investigation, Georgia-Pacific is willing to address such provisions upon request. In general, Georgia-Pacific's policy is to comply with all record retention provisions set forth in applicable environmental laws and regulations.

Certification of Authorized Representative

I certify that under a penalty of law that this document and all Enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By:  _____

Print Name: John C. Bottini

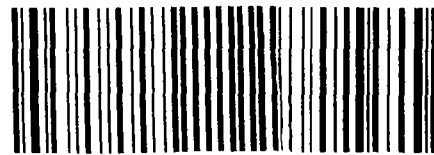
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Date: March 29, 2012



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